

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

*All Cases*

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIALS  
SHOULD BE SEALED [ECF NO. 3993]**

Judge: Hon. Lisa J. Cisneros  
Courtroom: Courtroom G – 15th Floor

Having considered statement in support of Plaintiffs' Administrative Motions to Consider Whether Another Party's Material Should Be Filed Under Seal, dated September 23, 2025, ECF 3993 ("Plaintiffs' Motion"), and Defendants' Unopposed Statement in Support of Plaintiffs' Motion, dated September 30, 2025, ECF \_\_\_\_ ("Statement in Support"), the Court hereby ORDERS that the following materials remain under seal as stated in Defendants' Statement in Support:

Document	Description	Defendants' Request
<b>Exhibit 1</b>	Excerpt of document produced by Uber (complete document attached as Exhibit Q), designated as Confidential, Bates stamped UBER_JCCP_MDL_000031233, used as an exhibit to the April 24, 2025 JCCP deposition of Katherine McDonald, containing confidential information about Uber's Flack system and non-public employee email addresses	Maintain under seal
<b>Exhibit 2</b>	Excerpt of production letter from counsel for Defendants to counsel for Plaintiffs dated August 19, 2024, containing link to secure file transfer and user name.	Seal in part (p. 1, link to secure file transfer and user name)
<b>Exhibit 3</b>	Draft Joint Discovery Letter Brief Relating to Safety Data	No request to seal
<b>Exhibit 4</b>	Excerpt of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Todd Gaddis	No request to seal
<b>Exhibit D</b>	Email correspondence between the Parties dated July 31 – August 5, 2025	No request to seal
<b>Exhibit E</b>	Email correspondence between the Parties dated August 7 – September 15, 2025	Seal in part (portions of pp. 3-5, ¶¶ 1, 7-15, pp. 14-15)
<b>Exhibit F</b>	Letter dated January 16, 2024 from counsel for Defendants to counsel for Plaintiffs pursuant to the Court's January 9, 2024 Order, containing detailed information regarding legal holds, document retention, and ESI locations, designated as Confidential, and previously sealed by the Court (ECF 221)	Maintain under seal

Document	Description	Defendants' Request
<b>Exhibit G</b>	Letter dated February 22, 2024 from counsel for Defendants to counsel for Plaintiffs responding to Plaintiffs' January 29, 2024 letter, containing detailed information regarding legal holds, document retention, and ESI locations, designated as Confidential	Maintain under seal
<b>Exhibit H</b>	Email correspondence between the parties dated April 19 – May 10, 2024	No request to seal
<b>Exhibit I</b>	January 18, 2024 declaration of Katherine McDonald, filed under seal in JCCP, containing confidential information on Uber's incident report data, systems, operations, and auditing	Seal in part (§§ 5-8)
<b>Exhibit K</b>	Correspondence from counsel for Defendants to counsel for Plaintiffs dated June 21, 2024, containing confidential information about non-custodial data sources	Seal in part (portions of p. 2 listing data sources)
<b>Exhibit N</b>	Certification of Katherine McDonald dated January 10, 2025, containing exhaustive list of Jira fields	Seal in part (pp. 2-3)
<b>Exhibit O</b>	Certification of Katherine McDonald dated February 25, 2025, containing exhaustive list of Bliss Actions and Bliss Messages fields	Seal in part (pp. 2-5)
<b>Exhibit P</b>	Certification of Katherine McDonald dated March 6, 2025	No request to seal
<b>Exhibit Q</b>	Document produced by Uber, designated as Confidential, Bates stamped UBER_JCCP_MDL_000031197-255, used as an exhibit to the April 24, 2025 JCCP deposition of Katherine McDonald, detailing confidential information on Uber's safety data operations, technology, usage, and practices and containing non-public employee email addresses.	Maintain under seal
<b>Exhibit R</b>	Email correspondence between the parties dated April 28 – May 1, 2025	No request to seal
<b>Exhibit S</b>	Draft Joint Discovery Letter Brief Relating to Safety Data	No request to seal
<b>Exhibit T</b>	Excerpts of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Todd Gaddis, containing confidential information about Uber's Flack system	Seal in part (90:3-93:25, 210:7-213:2)

Document	Description	Defendants' Request
<b>Exhibit X</b>	Excerpt of transcript of April 24, 2025 deposition of Katy R. McDonald, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's Flack system	Seal in part (42:2-44:7, 45:14-46:8, 94:19-25)
<b>Exhibit Y</b>	Excerpt of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Katy R. McDonald, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's Flack system	Seal in part (108:1-111:4, 111:13-114:8, 114:21-117:25)
<b>Exhibit Z</b>	Excerpt of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Hannah Nilles, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's Flack system	Seal in part (62:10-69:14, 302:21-305:25)

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Lisa J. Cisneros  
United States Magistrate Judge